

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
Western DIVISION

Lakisha Howell Pro SE

(Enter Above the Name of the Plaintiff in this Action)

1:18CV510

DELOTT

VS.

M.J. BOWMAN

(Enter above the name of the Defendant in this Action)

If there are additional Defendants, please list them:

Arron W. Shade

The State of Ohio Highway Patrol Subdivision
Nick Croswell

RECEIVED

JUL 25 2018

COMPLAINT

RICHARD W. NAGEL
Clerk Of Court
CINCINNATI, OHIO

I. Parties to the action:

Plaintiff: Place your name and address on the lines below. The address you give must be the address where the court may contact you and mail documents to you. A telephone number is required.

Lakisha Howell

Name - Full Name Please - PRINT

3719 Reading Road Apt 209

Street Address

Cincinnati, OH 45229

City, State and Zip Code

(513) 780-8475

Telephone Number

If there are additional Plaintiffs in this suit, a separate piece of paper should be attached immediately behind this page with their full names, addresses and telephone numbers. If there are no other Plaintiffs, continue with this form.

Defendant(s):

Place the name and address of each Defendant you listed in the caption on the first page of this Complaint. This form is invalid unless each Defendant appears with full address for proper service.

1. The ^{State} Ohio Highway Patrol Subdivision
Name - Full Name Please
9971 Cincinnati Dayton, West Chester OH 45065
Address: Street, City, State and Zip Code
2. _____

3. _____

4. _____

5. _____

6. _____

If there are additional Defendants, please list their names and addresses on a separate sheet of paper.

II. Subject Matter Jurisdiction

Check the box or boxes that describes your lawsuit:

- ☒ Title 28 U.S.C. § 1343(3)
[A civil rights lawsuit alleging that Defendant(s) acting under color of State law, deprived you of a right secured by federal law or the Constitution.]
- ☐ Title 28 U.S.C. § 1331
[A lawsuit "arising under the Constitution, laws, or treaties of the United States."]
- ☐ Title 28 U.S.C. § 1332(a)(1)
[A lawsuit between citizens of different states where the matter in controversy exceeds \$75,000.]
- ☐ Title _____ United States Code, Section _____
[Other federal status giving the court subject matter jurisdiction.]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO

Plaintiff

Lakisha Howell

3719 Reading Road apt 209

Cincinnati, Oh 45229

CASE NO.

COMPLAINT

Vs.

Defendants

The Ohio State Highway Patrol Subdivision

Aaron M. Shade

Nick Croswell

Factual Background

1. Plaintiff Lakisha Howell was cited for failure to dim headlights R.C. 4513.15 and arrested for operating a vehicle while under the influence of alcohol of R.C. 4511.19(A)(1)(a) by Aaron Shade Ohio State Highway Patrol Trooper on August 6, 2014.
2. I Lakisha Howell was denied Motion of Suppress on June 23, 2015 based on both the alleged unlawful stop of my automobile and the alleged unlawful administration of the Field- Sobriety Test.
3. I Lakisha Howell Plead No Contest to the violation of R.C. 4511.19 (A) (1) (a). I was found guilty of the OVI charge on April 7, 2017.
4. On March 1, 2018 the OVI charge was dismissed and the ALS was terminated. I was reimbursed my Reinstatement Fee in full by the Department of Treasury in Columbus Ohio. The Case closed 3/1/18.
5. I Lakisha Howell am seeking damages of \$3000, 000.00 for Negligence Tort for Wrongful and Unlawful acts.
6. The defendant(s) misrepresented the truth concerning acts of R.C. 4513.15 and R.C. 4511.19 (A) (1) (a). The defendants made these allegations with knowledge that they were false, with the intentions of misleading the courts.

7. The defendants acted intentionally and in reckless disregard and knew or should have known that its actions would result in serious emotional distress to the plaintiff.

8. The defendant(s) published these false malicious statements causing the plaintiff to suffer damages to her reputation, embarrassment, humiliation, and loss of enjoyment of life.

COUNT 1- NEGLIGENCE

The Plaintiff is a Natural Person and was deprived of her liberty without lawful justification and the infringement of her personal rights. The Plaintiff was improperly detained. False Imprisonment, Wanton, Willful Misconduct, Spirit of Revenge, interference of my rights secured by the Constitution of laws of the United States, False and Defamatory statements, Malicious Purpose, Reckless Manners, Lack of Probable Cause to file Criminal Charges, Outrageous and Extreme Conduct, Libel and Slander, Unlawful Restraint, Violation of my 4th Amendment Right, Violation of my 6 Amendment Right, Violation of my 13th Amendment Right, Violation of my 14th Amendment Right, A harm of breach of duty, Bad Faith, Insufficient Testimony, 2744.03, 2743.72, 4513.15, 2743.49, Lack of Articulable Facts or Probable Cause of OVI Charge, Unlawful Kidnapping and Misrepresentation.

COUNT 2- NEGLIGENCE

The Plaintiff dignity and reputation occasioned by the misuse of criminal proceedings. As a direct and proximate result of the Defendants negligence, The Plaintiff has experience and continues to experience great physical pain and suffering, and serious emotional distress, Harm, Contempt, Exposure to Public Hatred, Injuries of reputation, Embarrassment, Humiliation, Greif, Suffering serious Emotional Anguish, Physical Discomfort, Ridicule, Shame, Disgrace, 2 miscarries from stress, Ill-Will, Mental Distress, Loss of Business Opportunities, Loss of Life and Wrongful Damage.

COUNT 3 – NEGLIGENCE

Intentional Detention to a person, Unlawful Detention, Unlawful Confinement, Defendants conduct of Government Unit employee Occurred, Defendants unlawful conduct occurred with the scope of the employee's duty, Fault amounting at least to negligence on the part of the publisher, Actionability of the statement, irrespective of special harm cause by publication to the Plaintiff.

WHEREFORE, The Plaintiff demands judgement against the Defendants, severely, on all claims, and further request:

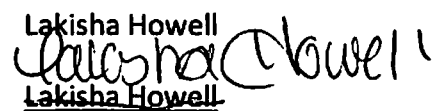
1. Loss Time
2. Physical Pain and Suffering

3. Past Pain and Suffering
4. Future Pain and Suffering
5. Emotional Distress
6. Loss of Enjoyment of Life
7. Economic Loss
8. Property Loss
9. Loss of ability to earn income
10. Loss of Future Income and Benefits
11. Interest

Based upon the itemization of damages, the damages exceed the amount of \$300,000 and the minimal jurisdiction amount of this court.

Respectfully Submitted,

Lakisha Howell

A handwritten signature in black ink that reads "Lakisha Howell". The signature is written in a cursive, flowing style. Below the signature, the name "Lakisha Howell" is printed in a standard font.

Lakisha Howell

3719 Reading Road Apt 209

Cincinnati, Ohio, 45229

513-780-8475